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UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

LAS VEGAS SUN, INC., a Nevada  
 corporation,

Plaintiff,

v.

SHELDON ADELSON, an individual, and as  
 the alter ego of News+Media Capital Group  
 LLC, Las Vegas Review-Journal, Inc., and  
 Interface Operations LLC dba Adfam;  
 PATRICK DUMONT, an individual, and as  
 alter ego of Las Vegas Review-Journal, Inc.,  
 News+Media Capital Group, LLC, and Interface  
 Operations LLC dba Adfam; NEWS+MEDIA  
 CAPITAL GROUP LLC, a Delaware limited  
 liability company; LAS VEGAS REVIEW-  
 JOURNAL, INC., a Delaware corporation;  
 INTERFACE OPERATIONS LLC DBA  
 ADFAM, a Delaware limited liability company

Case No. 2:19-cv-01667-ART-VCF

**NOTICE OF INTENT TO OPPOSE  
 DEFENDANTS'/COUNTERCLAIMANT'S  
 EMERGENCY MOTION TO EXPEDITE  
 RESOLUTION OF DEFENDANTS'  
 MOTION TO DISSOLVE PRELIMINARY  
 INJUNCTION [ECF NO. 915]**

1 and as alter ego of Las Vegas Review-Journal,  
2 Inc., and News+Media Capital Group, LLC; and  
DOES, I-X, inclusive,

3 Defendants.

4 LAS VEGAS REVIEW-JOURNAL, INC., a  
5 Delaware corporation,

6 Counterclaimant,

7 v.

8 LAS VEGAS SUN, INC. a Nevada corporation;  
9 BRIAN GREENSPUN, an individual and as the  
alter ego of Las Vegas Sun, Inc.; GREENSPUN  
10 MEDIA GROUP, LLC, a Nevada limited  
liability company, as the alter ego of Las Vegas  
Sun, Inc.,

11 Counterclaim Defendants.

1 PLEASE TAKE NOTICE that Plaintiff/Counterdefendant Las Vegas Sun, Inc., and  
2 Counterdefendants Brian Greenspun and Greenspun Media Group, LLC (collectively, “Sun”)  
3 intend to oppose the Emergency Motion to Expedite Resolution of Defendants’ Motion to Dissolve  
4 Preliminary Injunction (ECF No. 915) (“Motion”) filed by Defendant/Counterclaimant Las Vegas  
5 Review-Journal, Inc., and Defendants News+Media Capital Group LLC, Estate of Sheldon  
6 Adelson, Patrick Dumont, and Interface Operations LLC dba Adfam (collectively, “RJ”).

7 The Sun will file its opposition to the Motion in the regular course pursuant to Local Rule  
8 7-2(b). Pursuant to Local Rule 7-2(b), the Sun is permitted 14 days to respond to the Motion, and,  
9 accordingly, the Sun will respond on September 26, 2023.<sup>1</sup>

10 The Sun will oppose the RJ’s request for an emergency resolution of its Motion to Dissolve  
11 (ECF No. 853) (“Motion to Dissolve”) in accordance with the timing set forth in LR 7-2(b) on the  
12 basis that the RJ has failed to identify any emergency warranting expedited resolution. The RJ did  
13 not seek emergency resolution of its Motion to Dissolve when it filed the Motion to Dissolve on  
14 June 9, 2023, or seek a shortened briefing schedule. ECF No. 853. Instead, the RJ stipulated to an  
15 extended briefing schedule for the Sun’s opposition to the Motion to Dissolve and the RJ’s reply.  
16 ECF No. 855. The RJ’s Motion to Dissolve was fully briefed by August 18, 2023 (ECF No. 887),  
17 and the RJ did not raise its request for expedited relief until three weeks thereafter and waited until  
18 September 13, 2023. ECF No. 915. The RJ was unable to identify any changed circumstances since  
19 it filed its Motion to Dissolve that would warrant emergency relief to resolve the Motion to  
20 Dissolve, only stating the RJ was being forced to comply with an “illegal” and unenforceable  
21 contract. *See Ex. 1; see also* ECF No. 915. This is the same argument made in the RJ’s Motion to  
22 Dissolve and its corresponding Motion for Summary Judgment, and the same argument that the  
23 Sun has repeatedly disproven in its own summary judgment briefs. *See, e.g.,* ECF No. 829 at 23-  
24 32; ECF No. 843 at 47-53; ECF No. 853. These issues are properly before the Court in the parties’  
25 Motions for Summary Judgment and should be heard with those Motions. The RJ has failed to  
26 identify any “emergency” as required by Local Rule 7-4.

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28 <sup>1</sup> The RJ did not seek an expedited briefing schedule for its Motion. *See* ECF No. 915. Out of an abundance of caution, the Sun submits this Notice.

1 For these reasons, the Sun notifies the Court that it will oppose the RJ's Motion in  
2 accordance with the regular briefing schedule set forth in LR 7-2(b), on or before September 26,  
3 2023.

4 DATED this 13th day of September, 2023.

5 LEWIS ROCA ROTHGERBER CHRISTIE LLP

6  
7 By: /s/ Kristen L. Martini

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25  
26  
27  
28

**CERTIFICATE OF SERVICE**

Pursuant to Federal Rule of Civil Procedure 5(b), I certify that I am an employee of Lewis Roca Rothgerber Christie LLP, and that on the 13th day of September, 2023, I caused the foregoing **NOTICE OF INTENT TO OPPOSE DEFENDANTS'/COUNTERCLAIMANT'S EMERGENCY MOTION TO EXPEDITE RESOLUTION OF DEFENDANTS' MOTION TO DISSOLVE PRELIMINARY INJUNCTION [ECF NO. 915]** to be served by electronically filing the foregoing with the CM/ECF electronic filing system, which will send notice of electronic filing to:

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Hon. Philip M. Pro (Ret.)  
Special Master  
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/s/ Jessie M. Helm  
Employee of Lewis Roca Rothgerber Christie LLP

**INDEX OF EXHIBITS**

<b>Exhibit No.</b>	<b>Description</b>	<b>Page Nos.</b>
1	Transcript of Meet and Confer, <i>Las Vegas Sun, Inc. v. Adelson</i> , No. 2:19-cv-01667-ART-VCF (D. Nev. Sept. 11, 2023)	11